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CORPORATIONS—STATUTE OF LIMITATIONS—LIABILITY OF STOCKHOLDERS—In *West v. Topeka Savings Bank*, 66 Kan. 524, 63 L. R. A. 137, it is held that, so long as a private corporation is a solvent and going concern, the statute of limitations does not begin to run on a stockholder's subscription to its capital stock, to be paid at intervals upon the call of the board of directors, until a call has been made; but, when a private corporation becomes insolvent, and suspends active business, or when it closes its doors and ceases all its usual and ordinary business, leaving debts unpaid, the statute of limitations begins to run at once on a stockholder's subscription to its capital stock, to be paid at intervals upon the call of the board of directors, and then subject to call, even though no call be made. For the Virginia law on this subject see *Gold v. Paynter*, 101 Va. 714, 9 Va. L. R. 501; *Martin v. South Salem Land Co.*, 94 Va. 28; *Lewis v. Glenn*, 84 Va. 947; *Liberty Savings Bk. v. Land Co.*, 96 Va. 352; *Vanderwerken v. Glenn*, 85 Va. 9; and *Cason v. Seldner*, 77 Va. 293. See, also, note to *Thompson v. Reno Savings Bank*, 3 Am. St. Rep. 797, 827.

LIBEL—CHARGING CANDIDATE FOR OFFICE WITH CRIME—NEWSPAPERS—PRIVILEGE—If allegations of fact in a newspaper, charging a candidate for office with a criminal offense, are false, they are not privileged, and good faith and probable cause are not a defense. *Star Pub. Co. v. Honahoe* (Del.), 58 Atl. 513.

LIBEL—PUBLICATION—LETTERS MAILED—In *Rummey v. Worthley* (Mass.), 71 N. E. 316, it was held that where defendant sent libelous letters to plaintiff, having good reason to believe that they were likely to be opened by an authorized person other than plaintiff, his sending them by mail was a publication.

MALICIOUS PROSECUTION—MALICE—PROBABLE CAUSE—ADVICE OF COUNSEL—REFERENCE—An action for malicious prosecution cannot be maintained unless plaintiff alleges in his statement and shows on the trial the existence of both malice and want of probable cause. The motive of a person in bringing a prosecution is immaterial if he had probable cause to believe that the accused party was guilty of the offense. Advice of counsel given upon a full statement of all the facts, and acted upon in good faith, rebuts the presumption of malice arising from a want of probable cause in bringing a prosecution, and is therefore a defense to an action for malicious prosecution. *Lipowicz v. Jervis* (Pa.), 58 Atl. 619.

POLICE POWER—HORSESHOEING—In the recent case of *The People of the State of New York v. Beattie*, N. Y. L. J., July 26, 1904, the Supreme Court, Appellate Division, of New York, in passing on the validity of a statute providing that no person shall practice horseshoeing as a master or journeyman horseshoer until he has stood an examination before the board of examiners and registered, the court held: "This law arbitrarily